

KASOWITZ BENSON TORRES LLP

KENNETH R. DAVID  
DIRECT DIAL: (212) 506-1893  
DIRECT FAX: (212) 835-5293  
KDAVID@KASOWITZ.COM

1633 BROADWAY  
NEW YORK, NEW YORK 10019  
(212) 506-1700  
FAX: (212) 506-1800

ATLANTA  
HOUSTON  
LOS ANGELES  
MIAMI  
NEWARK  
SAN FRANCISCO  
SILICON VALLEY  
WASHINGTON DC

July 21, 2021

Honorable Denise L. Cote  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: BCBSM, Inc v. Vyera Pharmaceuticals, LLC, et al., 21-cv-01884 (DLC)

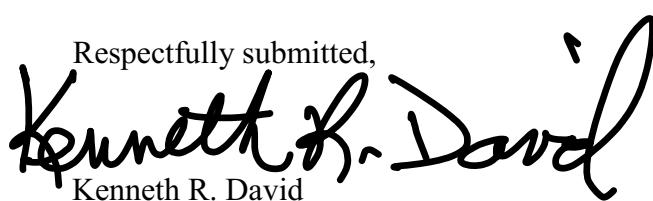
Dear Judge Cote:

We write on behalf of Defendant Kevin Mulleady in accordance with Rule 8.B of Your Honor's Individual Practices in Civil Cases and the requirements for electronic filing under seal. Mr. Mulleady respectfully requests permission to file limited portions of Exhibit A, Exhibit B, and Exhibit C to our forthcoming letter regarding Plaintiff BCBSM, Inc.'s discovery requests under seal (the "Exhibits"). The Exhibits contain trade secret, commercially-sensitive information that falls within the scope of "Confidential Information," as that term is defined in Section 2(a) of the Stipulated Protective Order dated June 1, 2021. (ECF No. 53.)

As required by Rule 8.B of Your Honor's Individual Practices in Civil Cases and the requirements for electronic filing under seal, Mr. Mulleady will publicly file a version of the Exhibits with proposed redactions redacting the material we respectfully request be filed under seal. As further required, in a separate docket entry, Mr. Mulleady will file under seal a version of the Exhibits with the proposed redactions highlighted.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

  
Kenneth R. David

The proposed redactions are  
approved. 7.26.2021.

  
DENISE COTE  
United States District Judge